

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK (buffalo)



JASON SHOLA AKANDE

(Petitioner)

VS.

) CASE NO.

) **17- CV1243** W

1. Michael Philips, I.C.E. Field Office Director)
2. Thomas Feeley, I.C.E. Field Office Director)
3. Thomas Homan, Acting Director Of I.C.E., Washington, D.C.)
4. Kirstjen Nielsen, The Secretary Of D.H.S., Washington, D.C.)
5. John Doe 1 (The Owner/Chief Executive Officer, Giant Airline, New York))
6. John Doe 2 (The Pilot Of Giant Airline))
7. John Doe 3 (The Co-Pilot Of Giant Airline))

(Defendants)

) AUGUST : 16 : 2017

"JURY TRIAL DEMANDED"

COMPLAINT FOR CIVIL RIGHTS VIOLATIONS, AS
SET FORTH IN BIVENS ACTION.

"JURY TRIAL DEMANDED"

I. INTRODUCTION.

DEFENDANTS USED FORGED TRAVEL CERTIFICATE, TO ILLEGALLY REMOVED PLAINTIFF FROM UNITED STATES, DURING THE PENDENCY OF PLAINTIFF'S IMMIGRATION COURT CASE, IN ORDER, TO HELP SOME ROGUE CONNECTICUT LAW ENFORCEMENT OFFICERS, GET AWAY WITH THE EGREGIOUS CIVIL RIGHTS VIOLATIONS LAW SUITS, PLAINTIFF FILED AGAINST THE ROGUE OFFICERS.

1.) The Plaintiff Hereby Respectfully Brings This Action, Under The 'Bivens Action'.

2.) This Law Suit Is basically About The Defendants: Michael Philips; The Owner/Chief Executive Officer Of Giant Airline (John Doe 1); The Pilot And Co-Pilot Of Giant Airline (John Doe 2 & 3); Deliberately '**FORGED**' Nigerian Travel Certificate Then, They Used The '**FORGED**' Certificate, To Illegally Removed Plaintiff From United States, To A Country Plaintiff Do Not Have Any Family Or Friend (Nigeria), In Order, To Help Some '**Rogue**' Connecticut Federal And State Law Enforcement Officers, Get Away With Plaintiff's: Multiple Illegal Arrest, 6 And A Half Years Of False Federal Imprisonment, And 2 Years Of Federal Prison Overtime Civil Law Suit Court Cases, Plaintiff Filed Against The 'Rogue' Connecticut Officers.

SEE: A Copy Of The 'Forged' Travel Certificate, Attached To This Petition Marked: **Exhibit A.**

NOTABLY: The Plaintiff Respectfully Request That, The Court Should Take Note Of The Reason Why, The Defendants Were So '**Desperate**', To Illegally Remove Him From United States, Stated In This Paragraph Number 2.

ICE Agents Have A Policy Of "Prioritizing" Removal Of I.C.E. Detainees, Who Have 'Meritorious' Egregious Civil Rights Violations Law Suits, Filed Against Them And/Or Against All Other U.S. Law Enforcement Officers, In Order, To Beat The Meritorious Civil Rights Law Suits, Hanging Over Their Heads. This Case Is One Of Those Cases.

II. JURISDICTION AND VENUE.

This Court Has Jurisdiction And Venue In This Case Because, As Of September 17, 2013, The Incidents Happened At, Federal Detention Centre, Batavia, New York.

Additionally, On The Same Date, The Forceful And The Illegal Deportation Flight (Giant Private Airline) Took Off From Buffalo Airport, New York, To Lagos, Nigeria.

Moreover, Defendant Michael Philips And Defendant Thomas Feeley, Were Field Office Director Of I.C.E., For Buffalo Field Office, Buffalo, New York.

III. PARTIES.

1.) PLAINTIFF: **Jason Shola Akande**, Was A Lawful Permanent Resident In United States For Many Years And He Lived With His Family In United States For Many Decades.

Address: 31 Sutton Place, Bloomfield, Connecticut. 06002.

2.) DEFENDANT: **Michael Phillips** Was The "Field Office Director For Detention And Removal, Bureau Of Immigration And Customs Enforcement (I.C.E.), Buffalo Field Office, At Federal Detention Centre, Batavia, New York, As Of September 17, 2013.

Last Known Address: Field Office Director For Detention And Removal, Buffalo Field Office, Bureau Of Immigration And Customs Enforcement, 250 Delaware Avenue, Buffalo, New York. 14202.

Defendant Michael Philips Was The Chief Coordinator/Chief Supervisor Of All Immigration Removals At, Federal Detention Centre, Batavia, New York, Where Plaintiff Was Detained, As Of That Time. Infact, Michael Philips Was On Board Of The Removal Flight (Giant Private Airline), On September 17, 2013, From Bufalo New York, To Lagos, Nigeria. Immigration And Customs Enforcement Is An Agency of Department Of Homeland Security (D.H.S.), Within The Executive Branch Of The Government Of The United States.

Defendant Michael Philips Himself, Hand Over The Forged Nigerian Travel Certificate To Nigerian Immigration Officers, When The Removal Flight Arrived In Nigeria. Defendant Michael Philips Therefore, Is The **'MAIN DEFENDANT'**, In This Case.

3.) **DEFENDANT:** Thomas Homan, Is The National Acting Director Of Immigration And Customs Enforcement, At Washington, DC.

Address: Bureau Of Immigration And Customs Enforcement, 500 12TH Street, S.W. Washington, D.C. 20024.

4.) **DEFENDANT:** Kirstjen Nielsen, Is The Secretary Of Department Of Homeland Security, 3801 Nebraska Avenue, N.W., Washington, D.C. 20016.

5.) **DEFENDANT:** JOHN DOE 1, Was The Owner/Chief Executive Officer, Of Giant Private Airline, New York, The Removal Plane, The Defendants Used, To Illegally Removed Plaintiff From United States, As Of September 17, 2013.

Address: Not Known However, During Discovery, Plaintiff Will Be Able To Secure The Defendant's Contact information.

The Deportation Plane Flight Information Is: B767; N641G7; GT18528; K1AG.

The Plaintiff Do Not Have The Full Name And Contact Information Of Defendant John Doe 1 Yet However, During The Discovery Stage of This Law Suit, Plaintiff Will Be Able To Secure The Information. Therefore, In The Mean Time, Plaintiff Identifies The Owner/C.E.O. Of Giant Private Airline As: JOHN DOE 1.

6.) DEFENDANT: JOHN DOE 2, Was The Pilot Of The Deportation Plane. He/She Witnessed The Illegal Beatings Of The Plaintiff Before The Flight And Throughout The Flight From Buffalo, New York, To Lagos, Nigeria.

Address: Unknown Yet.

7.) DEFENDANT: JOHN DOE 3, Was The Co-Pilot Of The Deportation Plane. He/She Witnessed The Illegal Beatings Of The Plaintiff Before The Flight And Throughout The Flight From Buffalo, New York, To Lagos, Nigeria.

Address: Unknown Yet.

2. SECOND DEFENDANT: Thomas Feely Is The Current Field Office Director Of I.C.E., Buffalo Field Office, Buffalo, New York.

Address: Bureau Of Immigration And Customs Enforcement, 250 Delaware Avenue, Buffalo, New York. 14202.

IV. PREVIOUS LAWSUITS.

The Plaintiff Have Not Begun Any Other Law Suits, With The Other Defendants, Dealing With Same Facts Involved In This Action Which Is: Illegal Removal From United States.

V.

STATEMENT OF CLAIM.**A1.) THE FIRST CLAIM PLAINTIFF FILED AGAINST
DEFENDANT MICHAEL PHILIPS:**

On Or Before September 17, 2013, The Defendant: **Michael Philips**, Was The Field Office Director For Detention And Removal, Bureau Of Immigration And Customs Enforcement (I.C.E.), At: Federal Detention Centre, Batavia, New York, '**Connived**' With His Fellow I.C.E. Agents, And With Some '**Rogue**' Connecticut Law Enforcement Officers, To '**FORGE**' Nigerian Government's Travel Certificate, Purposely To Use The Forged Document, To Illegally Remove Plaintiff From United States, (During The Pendency Of Plaintiff's Immigration Court Case) In Order, To Help The '**Rogue**' Connecticut Law Enforcement Officers, Get Away With Plaintiff's:

- a.) Multiple Illegal Arrests;
- b.) 7 Years Of Unlawful Federal Imprisonment; And
- c.) 2 Years Federal Prison Overtime,

Civil Law Suits, Plaintiff Filed Against The 'Rogue' Connecticut Law Enforcement Officers. The U.S. Civil Law Suits Were Still Pending In Courts, As Of The Date Of The Illegal Removal.

NOTE: ICE Agents Have A Policy Of "**Prioritizing**" Removal (By All Means Necessary, Which Includes by All Illegal Means), Of I.C.E. Detainees, Who Have '**Meritorious**' Egregious Civil Rights Violations Law Suits, Filed Against Them And/Or Filed Against All Other U.S. Law Enforcement Officers, In Order, To Beat The Meritorious Civil Rights Law Suits, Hanging Over Their Heads. This Case Is One Of Those Cases.

EXAMPLE: SEE: One Of The Civil Law Suits, Plaintiff Filed Against The 'Rogue' Connecticut Officers At: U.S. Connecticut District

Court Docket Case Number: 3:11-cv-01125-rnc, Before The Illegal Removal.

SEE: A Copy Of The Forged Nigerian Travel Certificate, Defendant Michael Philips Forged, Attached To This Petition, Marked **Exhibit A**.

On September 17, 2013, Defendant Michael Philips Used The 'Forged' Nigerian Travel Certificate (Exhibit A), To Illegally Removed Plaintiff From Buffalo Airport, United States To Lagos, Nigeria. Defendant Michael Philips Used Private Airline Called: '**GIANT AIRLINE**', To Execute The Illegal Removal.

When The Removal Plane Arrived In Nigeria, Defendant Michael Philips Himself, Gave Nigerian Immigration Officials, The 'Forged' Nigerian Travel Certificate (Exhibit A), As Authentic Travel Certificate Of The Plaintiff, Issued By Nigerian Consulate And Nigerian Embassy In Washington, D.C., U.S.A. Nigerian Immigration Officers Fell For The Tricks, They Allowed The Illegal Removal Into Their Country.

The Forensic Experts Of Interpol Nigeria Branch / Nigeria Police, Have Forensically Examined The Forged Nigerian Travel Certificate (Exhibit A). They (Police Forensic Experts) Forensically Compared The Forged Travel Certificate (Exhibit A) To An Authentic Travel Certificate, Issued by Nigerian Consulate In Washington, D.C., U.S.A., And They (Forensic Experts) Have Certified The Travel Certificate (Exhibit A), To Be '**FORGED**'. The Police Forensic and Document Experts found, among other illegal things, numerous "**CUT And PASTE**", on the "**FORGED**" Nigerian Travel Document.

SEE: A Copy Of The Police Forensic Reports Attached To This Petition, Marked: **Exhibit B**.

Nigerian Consular General, Washington D.C. , U.S.A. Branch And Nigerian Ambassador To United States, Washington D.C., U.S.A., Have Seen The Police Forensic Reports (Exhibit B), And They Have Declared That, They Did '**NOT**' Issue The Forged Travel Certificate (Exhibit A).

On January 23, 2015, Nigerian Government Certified The Nigerian Travel Certificate To Be '**FORGED**' (SEE: Exhibit B) Subsequently, Nigerian Government Declared The Illegal Removal As: '**ILLEGAL REMOVAL**', And '**ILLEGAL ENTRY**', Into Nigeria.

Accordingly, Defendant Michael Philips, Illegally Removed Plaintiff From United States.

NOTE: The Plaintiff Have Lost Most Of His Pending Civil Law Suits, He Filed Against The 'Rogue' Connecticut Law Enforcement Officers, Because Of The Illegal Removal Thus, The Illegal Removal Tricks Are Apparently Working For The Defendant Michael Philips And His Co-Conspirators: The 'Rogue' Connecticut Law Enforcement Officers.

The Plaintiff Is Now Leaving In **Limbo** And **Illegally** In Nigeria, Where He Has No Family Ties, While His Wife And Children Living In United States, Are Desperately Seeking Justice, In Order, To Reverse The Illegal Removal.

NOTE: The Court Should Take Note Of The '**Accural Date**', Which Is The Date, The Police Forensic Experts Issued Their Reports Of Investigation, Of The Forged Travel Certificate (Exhibit B), The Date is: '**JANUARY 23, 2015**'. Because, The Incident Date, Which Was The Date Of The Illegal Removal, Is Different From The 'Accural Date'. The 'Accural Date' Matters In This Case.

THE FEDERAL BASIS FOR THIS CLAIM IS:

The Defendant (Michael Philips) Violated The Due Process Clause Of The 5th Amendment Rights Of The Plaintiff, By Forging Foreign (Nigeria) Government's Travel Document, And He (Philips) Used The Forgery As Legal Basis, To Illegally Removed Plaintiff From United States.

Additionally, Defendant (Michael Philips): Violated Plaintiff's 4th Constitutional Amendment Rights (Seizure Without Legal Authority, Seizure Without Valid Travel Document); Violated Plaintiff's 14th, And 8th Constitutional Amendment Rights (Cruel And Unusual Punishment), By Removing Him Brutally, And Forcefully From United States To Nigeria Without Legal Authority.

Furthermore, Defendant Violated The Human Rights Of The Plaintiff, Guaranteed By The Constitution Of The United States, By Removing Him Illegally From United States.

WHAT THE PLAINTIFF WANTS THE COURT TO DO:

The Court Should Issue An Order Declaring That:

- 1.) The Removal Of The Plaintiff From United States To Nigeria, On September 17, 2013, By Defendant Michael Philips (As Noted Earlier), Using Forged Nigerian Travel Certificate, To Effectuate The Removal, Was An 'ILLEGAL REMOVAL'.
- 2.) The Defendant Michael Philips Subsequently Has Substantially Violated The Constitutional Rights of The Plaintiff.
- 3.) The Defendant Michael Philips Subsequently Have Violated: The United State Laws; The International Treatises United States Government Signed With United Nations; The International Laws; And Federal Republic Of Nigeria's Laws.
- 4.) The Defendant 'MUST' Immediately 'REVERSE' The Illegal Removal, By Bringing The Plaintiff Back To United States From Nigeria, Before A Deadline Date, To Be Set By The Court.
- 5.) The Defendant Michael Philips 'MUST' Pay The Plaintiff, The Amount Of: 10,000,000.00 (TEN MILLION DOLLARS), As

Compensation For The Egregious Damages, The Defendant's Illegal Removal Has Done To Plaintiff And His Family's Life.

6.) The Defendant Michael Philips And Department Of Homeland Security '**BARRED**' From Arresting Or Prosecuting Plaintiff For Any Immigration Charges, Because Of The Defendant's Egregious Professional Misconduct.

7.) Grant Any Further Relief That This Court May Deem Fit And Proper.

B1. THE SECOND CLAIM PLAINTIFF FILED AGAINST DEFENDANT MICHAEL PHILIPS.

Furthermore, On September 17, 2013, Defendant Philips Instructed Some I.C.E. Agents Working Under His Supervision, To Do To Plaintiff, The Following Egregious Human Rights Violations Stated Below:

a.) The I.C.E. Agents Forcefully Striped The Plaintiff Off His Clothes, Until He Was Completely **Naked, In Front Of All Female ICE Agents**, And In Front Of All Other Female Prison Staff, At Federal Detention Centre, Batavia, New York; Then,

b.) The I.C.E. Agents Tied Plaintiff Up With Chains And They **Severely Beat Him Up**; Then,

c.) The I.C.E. Agents Carried His Body (Tied Up Like A Dead Body), Into The Removal Flight (GIANT Private Airline), At Buffalo Airport; Despite Defendant Philips Did **Not** Have Plaintiff's Travel Document, And Despite That, Plaintiff's Immigration Court Case Was Still Pending In Court; Then,

d.) Defendant Michael Philips Illegally Removed Plaintiff To A Country, He(Plaintiff) Had No Family, No Friend, And Nobody.

THE FEDERAL BASIS FOR THE CLAIM.

The Defendant Michael Philips Violated Plaintiff's 8Th, Amendment Rights (Cruel And Unusual Punishment) And 5Th Constitutional Amendment Rights (Due Process Rights).

Furthermore, Defendant Philips Violated International Laws And International Treatises, United States Government Signed With United Nations.

WHAT THE PLAINTIFF WANTS THE COURT TO DO:

The Plaintiff Wants The Court To Do Exactly As He Noted On Page 9 Of This Petition. The Plaintiff Therefore, Incorporates What He Noted On Page 9 Of This Petition, As Though Fully Set Forth Here.

Grant Any Further Relief That This Court May Deem Fit And Proper.

C1. THE THIRD CLAIM PLAINTIFF FILED AGAINST DEFENDANT MICHAEL PHILIPS.

i.) OBSTRUCTION OF JUSTICE: The Defendant (Michael Phillips And His Fellow ICE Agents), 'DESTROYED', All Plaintiff's: Legal Documents, Legal Materials And Legal Documentary Evidence, Before They (Philips & Co.) Illegally Removed Him From United States To Nigeria, So That, Plaintiff Won't Be Able To Effectively Fight The Pending United States Courts Civil Law Suits, Plaintiff Filed Against The 'Rogue' Connecticut Officers, From Anywhere.

ii.) Furthermore, Defendant Philips Illegally Removed Plaintiff From United States, During The Pendency of Plaintiff's Immigration Court Case And During The Pendency Of Plaintiff's Appeal Court Cases Of The Illegal Arrest Done By The 'Rogue' Connecticut Law

Enforcement Officers. Plaintiff Was Representing Himself (Pro Se), In All The Pending Court Cases. Plaintiff Have Lost The Court Cases Because Of The Illegal Removal. Therefore, The Defendants Illegal Removal Tactics Are Apparently Working.

THE FEDERAL BASIS FOR THE CLAIM.

Defendant Michael Philips Violated Plaintiff's 4th And 5th Constitutional Amendment Rights.

Finally, Defendant Michael Philips Committed 'OBSTRUCTION OF JUSTICE' Crime, By Knowingly Destroyed, All Plaintiff's Legal Documents And Legal Materials, The Legal Documents And Legal Materials He (Defendant) Knew That, Plaintiff 'MUST' Possess, In Order, To Represent Himself, In His On-Going Civil Law Suits, He (Plaintiff) Filed Against The 'Rogue' Connecticut Law Enforcement Officers.

WHAT THE PLAINTIFF WANTS THE COURT TO DO:

The Plaintiff Wants The Court To Do Exactly, As He Noted On Page 9 Of This Petition. The Plaintiff Therefore, Incorporates What He Noted On Page 9 Of This Petition, As Though Fully Set Forth Here.

Grant Any Further Relief That This Court May Deem Fit And Proper.

A2. THE FIRST CLAIM PLAINTIFF FILED AGAINST DEFENDANT: THOMAS FEELEY.

Defendant Thomas Feeley Is The Current Field Office Director Of I.C.E., Buffalo Field Office, New York. He (Feeley) Replaced Defendant Michael Philips Who Has Retired.

Defendant Feeley Has Legal Authority And Legal Obligations, To Right All The Wrongs, His Predecessor Defendant Michael Philips Did To Plaintiff, He (Feeley) Can 'Not' Ignore Them.

Shortly After Police Forensic Experts Issued Their Reports Of The Investigation Of The 'Forged' Travel Certificate (Exhibit B), Plaintiff Sent A Certified Mail Letter With A Copy Of The Forensic Reports (Exhibit B), To Defendant Thomas Feeley, To Ask For 'IMMEDIATE REVERSAL' Of The Illegal Removal However, The Defendant Deliberately Refused To Respond To The Letter.

Additionally, On Around August 1, 2017; Plaintiff Sent Another Certified Mail Letter With A Copy Of The Forensic Reports (Exhibit B), To Defendant Thomas Feeley, To Once Again, Ask For The 'IMMEDIATE REVERSAL' Of The Illegal Removal However, Once Again, He (Feeley) Deliberately Refused, To Respond To Plaintiff's Letter. SEE: The Letter And The Proof Of The Certified Mail Postage, Plaintiff Sent To Defendant Feeley, Attached To This Petition, Marked: **Exhibit C1.**

Although, Defendant Thomas Feeley Was Not Directly Involved In The Plaintiff's Illegal Removal Like His Predecessor Defendant Michael Philips However, He (Feeley) Is Currently The Field Office Director Of I.C.E., Plaintiff Has Notified Him Of The Illegal Removal In The Certified Mail Letter, Plaintiff Sent To Him Twice (SEE: Exhibit C1), Defendant Feeley Has Legal Authority, And Legal Obligation As The Current Field Office Director Of I.C.E., To Right The Wrongs His Direct Predecessor (Defendant Michael Philips) Did To Plaintiff, But Still, Defendant Feeley Deliberately Refused To Do So.

THE FEDERAL BASIS FOR THIS CLAIM.

The Defendant Thomas Feeley, Violated The Due Process Clause Of The 5th Amendment Rights Of The Plaintiff. All Illegal Removal 'MUST' Be 'REVERSED' Because, That Is The Law.

The Defendant Feeley Is Legally Obligated, To 'REVERSE' The Plaintiff's Illegal Removal, When The Plaintiff Asked For It, In The Certified Mail Letter (Exhibit C1), Plaintiff Sent To The Defendant. The Defendant Feeley Is Aware Of The Illegal Removal, And He Did Nothing to Reverse It.

WHAT THE PLAINTIFF WANTS THE COURT TO DO:

The Court Should Issue An Order Declaring That:

- 1.) The Defendant Thomas Feeley Has Legal Authority And Legal Obligation, To 'IMMEDIATELY REVERSE' The Plaintiff's Illegal Removal, Done By His Predecessor Michael Philips, When The Plaintiff Asked For It, In The Plaintiff's Certified Mail Letter (Exhibit C1), Plaintiff Sent To Him (Feeley).
- 2.) The Defendant Thomas Feeley, Therefore Violated Plaintiff's Due Process Clause of The 5th Amendment Constitutional Rights, By His Refusal To Do So.
- 3.) Additionally Defendant Thomas Feeley Violated The Human Rights Of The Plaintiff, Guaranteed By The Constitution Of The United States.
- 4.) The Defendant 'MUST' Immediately Bring Plaintiff Back To United States From Nigeria, Before A Deadline Date, To Be Set By The Court.
- 5.) The Defendant 'MUST' Pay Plaintiff A Total Amount Of: '10,000,000.00' (Ten Million Dollars).

6.) The Defendant Thomas Feeley And Department Of Homeland Security **'BARRED'** From Arresting Or Prosecuting Plaintiff For Any Immigration Charges, Because Of The Defendant's Professional Misconduct.

7.) Grant Any Further Relief That This Court May Deem Fit And Proper.

A3. THE FIRST CLAIM PLAINTIFF FILED AGAINST DEFENDANT: THOMAS HOMAN.

Defendant Thomas Homan Is The Current Acting Director Of Immigration And Customs Enforcement, Washington, D C.

Defendant Thomas Homan Has Legal Authority And Legal Obligation, To Right The Wrongs Defendant Michael Philips Did To Plaintiff, He (Homan) Can 'Not' Ignore Them.

Shortly After Police Forensic Experts Issued Their Reports Of The Investigation Of The 'Forged' Travel Certificate (Exhibit B), Plaintiff Sent A Certified Mail Letter With A Copy Of The Forensic Reports (Exhibit B), To Defendant Thomas Homan, To Ask For **'IMMEDIATE REVERSAL'** Of The Illegal Removal However, The Defendant Deliberately Refused To Respond To The Letter.

Additionally, On Around August 1, 2017; Plaintiff Sent Another Certified Mail Letter With A Copy Of The Forensic Reports (Exhibit B), To Defendant Thomas Homan, To Once Again, Ask For The **'IMMEDIATE REVERSAL'** Of The Illegal Removal However, Once Again, He (Homan) Deliberately Refused, To Respond To Plaintiff's Letter. **SEE:** The Letter And The Proof Of The Certified Mail Postage, Plaintiff Sent To Defendant Homan, Attached To This Petition, Marked: **Exhibit C2.**

Although, Defendant Thomas Homan Was Not Directly Involved In The Plaintiff's Illegal Removal Like His Defendant Michael Philips

However, He (Homan) Is Currently The Acting Director Of I.C.E. Plaintiff Has Notified Him Of The Illegal Removal In The Certified Mail Letter, Plaintiff Sent To Him Twice (SEE: Exhibit C2), Defendant Homan Has Legal Authority, And Legal Obligation As The Current Acting Director Of I.C.E., To Right The Wrongs Michael Philips Did To Plaintiff, But Still, Defendant Homan Deliberately Refused To Do So.

THE FEDERAL BASIS FOR THIS CLAIM.

The Defendant Thomas Homan, Violated The Due Process Clause Of The 5th Amendment Rights Of The Plaintiff. All Illegal Removal **'MUST'** Be **'REVERSED'** Because, That Is The Law.

The Defendant Homan Is Legally Obligated, To **'REVERSE'** The Plaintiff's Illegal Removal, When The Plaintiff Asked For It, In The Certified Mail Letter (Exhibit C2), Plaintiff Sent To The Defendant. The Defendant Homan Is Aware Of The Illegal Removal, And He Did Nothing to Reverse It.

WHAT THE PLAINTIFF WANTS THE COURT TO DO:

The Court Should Issue An Order Declaring That:

- 1.) The Defendant Thomas Homan Has Legal Authority And Legal Obligation, To **'IMMEDIATELY REVERSE'** The Plaintiff's Illegal Removal, Done By Defendant Michael Philips, When The Plaintiff Asked For It, In The Plaintiff's Certified Mail Letter (Exhibit C2), Plaintiff Sent To Him (Homan).
- 2.) The Defendant Thomas Homan, Therefore Violated Plaintiff's Due Process Clause of The 5th Amendment Constitutional Rights, By His Refusal To Do So.

- 3.) Additionally Defendant Thomas Homan Violated The Human Rights Of The Plaintiff, Guaranteed By The Constitution Of The United States.
- 4.) The Defendant **MUST** Immediately Bring Plaintiff Back To United States From Nigeria, Before A Deadline Date, To Be Set By The Court.
- 5.) The Defendant Thomas Homan And Department Of Homeland Security **BARRED** From Arresting Or Prosecuting Plaintiff For Any Immigration Charges, Because Of The Defendant's Professional Misconduct.
- 6.) The Defendant **MUST** Pay Plaintiff A Total Amount Of: '10,000,000.00' (Ten Million Dollars).
- 7.) Grant Any Further Relief That This Court May Deem Fit And Proper.

A4. THE FIRST CLAIM PLAINTIFF FILED AGAINST DEFENDANT: KIRSTEJEN NIELSEN.

Defendant Kirstjen Nielsen Is The Current Secretary Of, Department Of Homeland Security, Washington, D C.

Immigration And Customs Enforcement (I.C.E.) Is An Agency Of Department Of Homeland Security (D.H.S.), Within The Executive Branch Of The Government, And An Agency Within Meaning Of 5 U.S.C. Section #: 552(f)(1).

Defendant Kirstjen Nielsen Therefore Has Legal Authority And Legal Obligation, To Right The Wrongs Defendant Michael Philips Did To Plaintiff, She (Nielsen) Can 'Not' Ignore Them Because, D.H.S. Has Constitutional Supervisory Role Over I.C.E.

Shortly After Police Forensic Experts Issued Their Reports Of The Investigation Of The 'Forged' Travel Certificate (Exhibit B), Plaintiff

Sent A Certified Mail Letter With A Copy Of The Forensic Reports (Exhibit B), To The Secretary Of D.H.S., To Ask For 'IMMEDIATE REVERSAL' Of The Illegal Removal However, The Secretary Of D.H.S. Deliberately Refused To Respond To The Letter.

Additionally, On Around August 1, 2017; Plaintiff Sent Another Certified Mail Letter With A Copy Of The Forensic Reports (Exhibit B), To Defendant Kirstjen Nielsen , To Once Again, Ask For The 'IMMEDIATE REVERSAL' Of The Illegal Removal However, Once Again, She (Nielsen) Deliberately Refused, To Respond To Plaintiff's Letter. SEE: The Letter And The Proof Of The Certified Mail Postage, Plaintiff Sent To Defendant Kirstjen Nielsen, Attached To This Petition, Marked: **Exhibit C3**.

Although, Defendant Kirstjen Nielsen Was Not Directly Involved In The Plaintiff's Illegal Removal Like Defendant Michael Philips However, She (Nielsen) Is Currently The Secretary Of D.H.S., Plaintiff Has Notified Him Of The Illegal Removal In The Certified Mail Letter, Plaintiff Sent To Him Twice (SEE: Exhibit C4), Defendant Nielsen Has Legal Authority, And Legal Obligation To Right The Wrongs Defendant Michael Philips Did To Plaintiff, But Still, Defendant Nielsen Deliberately Refused To Do So.

THE FEDERAL BASIS FOR THIS CLAIM.

The Defendant Kirstjen Nielsen, Violated The Due Process Clause Of The 5th Amendment Rights Of The Plaintiff. All Illegal Removal 'MUST' Be 'REVERSED' Because, That Is The Law.

The Defendant Kirstjen Is Legally Obligated, To 'REVERSE' The Plaintiff's Illegal Removal, When The Plaintiff Asked For It, In The Certified Mail Letter (Exhibit C3), Plaintiff Sent To The Defendant. The Defendant Nielsen Is Aware Of The Illegal Removal, And She Did Nothing to Reverse It.

WHAT THE PLAINTIFF WANTS THE COURT TO DO:

The Court Should Issue An Order Declaring That:

- 1.) The Defendant Kirstjen Has Legal Authority And Legal Obligation, To 'IMMEDIATELY REVERSE' The Plaintiff's Illegal Removal, Done By Defendant Michael Philips, When The Plaintiff Asked For It, In The Plaintiff's Certified Mail Letter (Exhibit C4), Plaintiff Sent To Her (Nielsen).
- 2.) The Defendant Kirstjen Nielsen, Therefore Violated Plaintiff's Due Process Clause of The 5th Amendment Constitutional Rights, By His Refusal To Do So.
- 3.) Additionally Defendant Kirstjen Nielsen Violated The Human Rights Of The Plaintiff, Guaranteed By The Constitution Of The United States.
- 4.) Defendant 'MUST' Bring Plaintiff Back To United States from Nigeria, Before A Deadline, Date To Be Set By The Court.
- 5.) Defendant 'MUST' Pay Plaintiff, A Total Amount Of: \$10,000,000.00 (Ten Million Dollars).
- 6.) The Defendant Nielsen And Department Of Homeland Security 'BARRED' From Arresting Or Prosecuting Plaintiff For Any Immigration Charges, Because Of The Defendant's Egregious Professional Misconduct.
- 7.) Grant Any Further Relief That This Court May Deem Fit And Proper.

A5. THE FIRST CLAIM PLAINTIFF FILED AGAINST DEFENDANT: JOHN DOE 1 (OWNER OR C.E.O. OF GIANT PRIVATE AIRLINE).

On September 17, 2013, Giant Private Airline Was The Private Airline The Defendants Used, To Illegally Removed Plaintiff From Buffalo Airport, New York, United States, To Nigeria. Giant Airline Was The Deportation Plane.

The Defendant John Doe 1 [Owner Or C.E.O. Of Giant (Private)]] Airline Therefore Connived With Defendant Michael Philips, To Use His/Her Plane, To Illegally Removed Plaintiff From United States To Nigeria.

Furthermore, On September 17, 2013, At Buffalo Airport, Defendant John Doe 1, 'Connived' With Defendant Philips And His Fellow I.C.E. Agents, To Severely Beat-Up Plaintiff, To Tie Him Up With Chains, Then, To Carry His Body Into The Deportation Plane Like A Dead Body Despite, Defendant John Doe 1 Knew That, Defendant Philips Did Not Have Plaintiff's Valid Travel Document Thus, Defendant Philips Did 'Not' Have Legal Authority, To Remove Plaintiff To Lagos, Nigeria.

Moreover, Defendant John Doe 1 'Connived' With Defendant Philips, To Chained Down Plaintiff And Beat Him Up, Through Out The 14 Hours Deportation Flight From Buffalo, New York To Lagos, Nigeria.

NOTE: The Plaintiff Intends To Sue The 2 Pilots Of The Deportation Flight As Well However, Because The Owner/C.E.O. Of Giant Airline (John Doe 1) Has Gone Hiding, Plaintiff Will First Sue The Owner (John Doe1) Then, Later, Plaintiff Will Add The 2 Pilots To The List Of Defendants.

THE FEDERAL BASIS FOR THIS CLAIM.

Defendant John Doe 1 (Owner/C.E.O. Of Giant Airline) Violated Plaintiff's: 4th, 5th, 8th, And 14th Constitutional Amendment Rights Of The Plaintiff Together With his Co-Conspirators (The Defendants).

WHAT THE PLAINTIFF WANTS THE COURT TO DO.

The Court Should Issue An Order Declaring That:

- 1.) Defendant John Doe 1 (Owner/C.E.O. Giant Airline), Violated Plaintiff's 4th, 5th, 8th, And 14th Constitutional Amendment Rights, Together With His Co-Conspirators (The Defendants).
- 2.) Defendant **MUST** Bring The Plaintiff Back To United States From Nigeria, Before A Deadline Date, To Be Set by The Court.
- 3.) The Defendant **MUST** Pay Plaintiff, The Total Amount of: \$10,000,000.00 (Ten Million Dollars).
- 4.) Grant Any Further Relief That This Court May Deem Fit And Proper.

A6. THE FIRST CLAIM PLAINTIFF FILED AGAINST DEFENDANT: JOHN DOE 2 (THE PILOT OF THE DEPORTATION PLANE, GIANT PRIVATE AIRLINE).

On September 17, 2013, Giant Private Airline Was The Private Airline The Defendants Used, To Illegally Removed Plaintiff From Buffalo Airport, New York, United States, To Nigeria. Giant Airline Was The Deportation Plane.

The Defendant John Doe 2 Was The Pilot Of The Deportation Plane, Giant Airline, He/She Connived With Defendant Michael Philips, To Use Giant Airline, To Illegally Removed Plaintiff From United States To Nigeria.

Furthermore, On September 17, 2013, At Buffalo Airport, Defendant John Doe 2, 'Connived' With Defendant Philips And His Fellow I.C.E. Agents, To Severely Beat-Up Plaintiff, To Tie Him Up With Chains, Then, To Carry His Body Into The Deportation Plane Like A Dead Body Despite, Defendant John Doe 1 Knew That, Defendant Philips Did Not Have Plaintiff's Valid Travel Document Thus, Defendant Philips Did 'Not' Have Legal Authority, To Remove Plaintiff To Lagos, Nigeria.

Moreover, Defendant John Doe 2 'Connived' With Defendant Philips, To Chained Down Plaintiff And Beat Him Up, Through Out The 14 Hours Deportation Flight From Buffalo, New York To Lagos, Nigeria.

NOTE: The Plaintiff Intends To Sue The 2 Pilots Of The Deportation Flight As Well However, Because The Owner/C.E.O. Of Giant Airline (John Doe 1) Has Gone Hiding, Plaintiff Will First Sue The Owner (John Doe1) Then, Later, Plaintiff Will Add The 2 Pilots To The List Of Defendants.

THE FEDERAL BASIS FOR THIS CLAIM.

Defendant John Doe 2 (Pilot Of Giant Airline) Violated Plaintiff's: 4th, 5th, 8th, And 14th Constitutional Amendment Rights Of The Plaintiff Together With his Co-Conspirators (The Defendants).

WHAT THE PLAINTIFF WANTS THE COURT TO DO.

The Court Should Issue An Order Declaring That:

- 1.) Defendant John Doe 2 (Pilot Of The Deportation Flight, Giant Airline), Violated Plaintiff's 4th, 5th, 8th, And 14th Constitutional Amendment Rights, Together With His Co-Conspirators (The Defendants).
- 2.) Defendant **MUST** Bring The Plaintiff Back To United States From Nigeria, Before A Deadline Date, To Be Set by The Court.
- 3.) The Defendant **MUST** Pay Plaintiff, The Total Amount of: \$10,000,000.00 (Ten Million Dollars).
- 4.) Grant Any Further Relief That This Court May Deem Fit And Proper.

A7. THE FIRST CLAIM PLAINTIFF FILED AGAINST DEFENDANT: JOHN DOE 3 (THE CO-PILOT OF THE DEPORTATION PLANE, GIANT PRIVATE AIRLINE).

On September 17, 2013, Giant Private Airline Was The Private Airline The Defendants Used, To Illegally Removed Plaintiff From Buffalo Airport, New York, United States, To Nigeria. Giant Airline Was The Deportation Plane.

The Defendant John Doe 3 Was The Co-Pilot Of The Deportation Plane, Giant Airline, He/She **Connived** With Defendant Michael Philips, To Use Giant Airline, To Illegally Removed Plaintiff From United States To Nigeria.

Furthermore, On September 17, 2013, At Buffalo Airport, Defendant John Doe 3, **Connived** With Defendant Philips And His Fellow I.C.E. Agents, To Severely Beat-Up Plaintiff, To Tie Him Up

With Chains, Then, To Carry His Body Into The Deportation Plane Like A Dead Body Despite, Defendant John Doe 1 Knew That, Defendant Philips Did Not Have Plaintiff's Valid Travel Document Thus, Defendant Philips Did 'Not' Have Legal Authority, To Remove Plaintiff To Lagos, Nigeria.

Moreover, Defendant John Doe 3 'Connived' With Defendant Philips, To Chained Down Plaintiff And Beat Him Up, Through Out The 14 Hours Deportation Flight From Buffalo, New York To Lagos, Nigeria.

THE FEDERAL BASIS FOR THIS CLAIM.

Defendant John Doe 1 (Owner/C.E.O. Of Giant Airline) Violated Plaintiff's: 4th, 5th, 8th, And 14th Constitutional Amendment Rights Of The Plaintiff Together With his Co-Conspirators (The Defendants).

WHAT THE PLAINTIFF WANTS THE COURT TO DO.

The Court Should Issue An Order Declaring That:

- 1.) Defendant John Doe 3 (Co-Pilot Of The Deportation Flight), Violated Plaintiff's 4th, 5th, 8th, And 14th Constitutional Amendment Rights, Together With His Co-Conspirators (The Defendants).
- 2.) Defendant 'MUST' Bring The Plaintiff Back To United States From Nigeria, Before A Deadline Date, To Be Set by The Court.
- 3.) The Defendant 'MUST' Pay Plaintiff, The Total Amount of: \$10,000,000.00 (Ten Million Dollars).
- 4.) Grant Any Further Relief That This Court May Deem Fit And Proper.

STATUTE OF LIMITATIONS.

In The Event The Defendants Wants To Use Statute Of Limitations, As An Excuse (A Defense) In This Case, This Petition Was Timely Filed Because Of The Following Facts Stated Below:

1. Although The Incident Date (The Date Of The Illegal Removal) Was **September 17, 2013** However, The 'Accural Date' Was '**January 23, 2015**' Because, On The Date of The Illegal Removal, Plaintiff Did Not Know That, Defendant Michael Philips '**FORGED**' The Nigerian Travel Certificate Thus, Plaintiff Did Not Know That, Defendant Philips Violated His Constitutional Rights Until, 'January 23, 2015', Police Forensic Experts Issued Their Forensic Evaluation Reports, Of The Forged Travel Certificate (Exhibit B), Certifying The Travel Certificate (Exhibit A), To Be '**FORGED**' Thus, The 'Accural Date' Is: '**January 23, 2015**'.

2. In Fact, When The Deportation Plane Arrived In Nigeria, Defendant Michael Philips, Told Nigerian Immigration Officials And Plaintiff That, Nigerian Consulate, Washington D.C., U.S.A., Issued And Gave Him The Nigerian Travel Certificate (Exhibit A). The Travel Certificate Appeared Authentic To The Plaintiff And To The Nigerian Immigration Officials Subsequently, Nigerian Immigration Officials Allowed The Removal Into Nigeria Therefore, There Was No Need For Plaintiff, To Begin The Law Suit Process Against Defendant Michael Philips, On The Incident Date (September 17, 2013) Or Thereafter.

3. Second Circuit Court Defines 'Accural Date' As: Cause Of Action Accures, When Plaintiff Has A "Complete And Present" Cause Of Action And Can File Suit And Obtain Relief. SEE: 'Leon v. Murphy, 988F.2d 303, 308(2d Cir.1993)'. Also, SEE: 2nd Circuit Court Definition Of 'Accural Date' At: "Bankers' Trust Co. v. Rhoades, 859 F.2d 1096 (2d Cir. 1988), Cert. denied, 490 U.S. 1007 (1989).

4. Cause Of Action Therefore Did Not Accures In This Case Until, The Date, The Police Forensic Experts Issued Their Reports (Exhibit B), Certifying The Forged Travel Certificate (Exhibit A), To Be 'FORGED'.

5. Furthermore, The Court Should Take into Consideration The Fact That, Plaintiff Is In Nigeria, Thousands Of Miles Away From United States, Without His Legal Documents (Which Were Illegally Seized And Destroyed by The Defendants Before The Illegal Removal), Without His Family, And Without Any Friend Thus, Plaintiff Could Not File Law Suit Until Now.

6. Moreover, This Petition Is Eligible For 'Equitable Tolling' As Defined By Second Circuit. SEE: Second Circuit Court's Rules And Regulations Governing 'Equitable Tolling'. The Plaintiff Has Always Been Going Through 'Extraordinary Circumstances' Since The Illegal Removal. Besides, Plaintiff Have Already Asked The Defendants For 'Administrative Remedies' (Reversal Of The Illegal Removal), Repeatedly Since 2015 (SEE: Exhibits: C1, C2, C3) However, Defendants Deliberately Refused to Do So.

7. Most Importantly, The Court Should Take Into Consideration, The Fact That, Plaintiff Have Repeatedly Asked The Defendants For 'Administrative Remedies' (Reversal of The Illegal Removal), In Couples Of Letters (Exhibits: C1, C2, C3), He Posted To Them, Since After Plaintiff Received The Police Forensic Reports (Exhibit B), So That Judges Won't Have To Spend Their 'Precious Time' And 'Court's Scarce Resources', On Another Obvious, Proven And Certified Government Agents Professional Misconduct Case (This Case) However, Defendants Deliberately Refused To Do So.

The Defendants In This Case, Should Have 'REVERSED' The Illegal Removal Themselves, Since 2015, When Plaintiff Asked For It Because, Plaintiff Have Given Them (Defendants) The Conclusive, Obvious, Proven, And Certified Evidence Of The Illegal Removal (Exhibits B). Defendants Should Have Settled This Matter Without Court, Since

2015, In The First Place. Defendants Therefore Have No Credible Excuse.

SUMMARY OF RELIEF SOUGHT.

The Court Should Issue An Order Declaring That:

- 1.) The Defendants Michael Philips And John Doe 1, Did 'NOT' Have Legal Authority, To Remove Plaintiff From United States To Nigeria Because, They (Defendants) Did 'NOT' Have Valid Nigerian Travel Document.
- 2.) The Defendants Have Substantially Violated Plaintiff's 4th, 5th, 8th And 14th Constitutional Rights Because Of The Illegal Seizure, Illegal Beatings, Illegal Destruction Of Plaintiff's Legal Materials, And The Illegal Removal, Stated In This Petition.
- 3.) All The Defendants, 'MUST' 'REVERSE' The Illegal Removal, By Bringing Plaintiff Back To United States From Nigeria, Before A Deadline Date, To Be Set By The Court.
- 4.) All The Defendants 'MUST' Pay Plaintiff, The Total Amount Of: \$10,000,000.00 (Ten Million Dollars) 'EACH'.
- 5.) All The Defendants Are 'BARRED' From Arresting Or Prosecuting Plaintiff For Any Immigration Charges, Because Of The Defendant's Egregious Professional Misconduct.
- 6.) The D.H.S. And I.C.E., 'MUST' Re-Instate Plaintiff's Lawful Permanent Resident Status in United States, After They Bring Him Back To United States, Because Of The Defendants Egregious Professional Misconduct.
- 7.) Grant Any Further Relief That This Court May Deem Fit And Proper.

I Declare Under Penalty Of Perjury that, the Foregoing Is Correct.

Executed On: August 16, 2017,

Respectfully Submitted,

Sworn To As Set Forth In 28 U.S.C. Sec. 1746


Jason Shola Akande,

Pro Se Plaintiff,

31 Sutton Place,

Bloomfield, Connecticut. 06002.

Email Address:

sholadotshola@gmail.com

EXHIBIT.

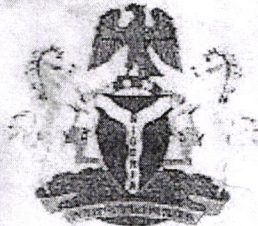
“A”.

The Forged Nigerian Travel Certificate, Which
Defendant Michael Philips Forged Himself.

THIS CERTIFICATE IS FOR A DIRECT JOURNEY TO NIGERIA
AND NOT TO BE USED TO ANY OTHER COUNTRY

VALID FOR 30 DAYS ONLY
EFFECTIVE SEPT. 17, 2013

C/MM/WDC/4/XV/52



FEDERATION OF NIGERIA

EMERGENCY CERTIFICATE



THIS IS TO CERTIFY THAT :-

MR. JASON AKANDE

has stated to me that he/she is a CITIZEN OF NIGERIA

and that I have no reason to doubt his/her statement.

This Certificate is valid only for the journey to LAGOS, NIGERIA

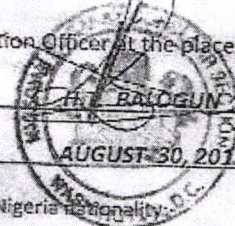
Leaving U.S.A



Signature of Bearer

For LAGOS, NIGERIA, and must be surrendered to Immigration Officer at the place of arrival

(Signed)



(Date)

AUGUST 30, 2013

Summary of the statements made by the holder in proof of his/her Nigeria nationality:-

FOR A DIRECT JOURNEY TO LAGOS, NIGERIA BY DEPORTATION CHARTERED FLIGHT AIRLINES DEPORTED
BY U.S. IMMIGRATION FOR THE OFFENSE OF FRAUD XX
with any immigration regulation in force in the country of destination or from the necessity of obtaining a visa when required

EXHIBIT

“B”.

The Police Forensic Reports, Issued By Interpol Nigeria Branch /
Nigeria Police, Which Certified The Nigerian Travel Certificate As:
‘Forged’.

Telegraphic Address
COMPOL FORENSIC,
FORCID LAGOS
Telephone No. (01) 2670571
nigpolforensic@yahoo.com
In reply please quote:



The Commissioner of Police
Forensic Science Laboratory
D' Department (Force C.I.D.)
Nigeria Police Force
P. M.B. 12513
Ikoyi – Lagos.

23rd January, 2015,

DFX/9/2015

Jason Shola Akande,
Plot 16, Obot Close,
Beside Kubwa Post Office,
Phase 4, Kubwa,
Abuja.

RESULT OF DOCUMENT EXAMINATION

Your letter dated 22nd December, 2014 with forwarding letters, respectively, CB:3380/X/FHQ/ABJ/VOL.18/105 dated 31st December, 2014, and CR:3000/X/FCD/FHQ/ABJ/VOL.2/70 dated 14th January, 2015, from Deputy Inspector General of Police and Commissioner of Police, Forensic and Crime Data, Abuja, and the attached documents "FEDERATION OF NIGERIA EMERGENCY CERTIFICATES" C/MM/WDC/4/XV/52 and C/MM/WDC/4/XV/61, respectively, marked annexure 'A' and 'B' were received and prudently examined.

2. **REQUEST:** To examine, compare and determine whether questioned document marked annexure 'A' is the same with the standard document marked annexure 'B'.

3. Scientific examination carried out via video spectral comparator (VSC-5000) and other distinguish apparatus on the questioned typescripts on document marked 'A' revealed evidence of unnatural execution in its outlines. In juxtaposition with the typescripts in the relevant columns of document marked annexure 'B', I found characteristics features of disparity between them. i.e. the spacing and wordings in the relevant columns of document 'A' are not identical with that of document 'B'.

4. Further scientific examination and comparison through the same apparatus carried out on the signature in the column of 'H.T. BALOGUN' on document marked annexure 'A' with the signature in the column of 'H.T. BALOGUN' on document marked annexure 'B' revealed inherent features of non-identity between them. i.e. the initial, medial and terminal strokes of the questioned signature in the

- 1 -

relevant column of document marked 'A' are different from that of signature on document 'B'

5. OPINION: Based on these findings, it is my opinion that:

- (a) there is evidence of cut and paste of 'MR JASON SHOLA AKANDE' from another document on the questioned document marked annexure 'A'
- (b) the spacing of name 'MR JASON SHOLA AKANDE' on document marked annexure 'A' is different from that of name 'MR MORKA GANDHI' on document marked annexure 'B'
- (c) the words 'MAIL/WIRE' before word Fraud on authentic document marked annexure 'B' is conspicuously absent in between the word Fraud on the questioned document marked annexure 'A'
- (d) the signatory to the questioned signature in the column of 'H.T. BALOGUN' on document marked annexure 'A' is different from the signatory to the signature in the column of 'H.T. BALOGUN' on document marked annexure 'B'.

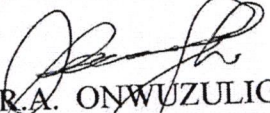
6. I attached herewith the comparative table used during this analysis. The comparative table is illustrated horizontally in lines '1' and '3' and vertically in line '2'.

(a) In line '1' arrow '1' and '2' showed different spacing between 'MR JASON' on document 'A' and 'MR MORKA' on document 'B'. Arrow '3' and '3A' on left hand side showed evidence of cut and paste of name 'MR JASON SHOLA AKANDE' on document 'A'.

(b) line '2' is comparison between questioned typescripts on document 'A' first line and authentic typescripts on document 'B' in the second line. arrow '1' indicate the absent of 'MAIL/WIRE' before the word fraud on document 'A', unlike document 'B', arrow '2' showed that fraud end below letter 'O' in deportation on document 'A' while fraud on document 'B' end below 'H' in chartered

(c) line '3' showed differences through the indicated arrows between questioned signature in the column of 'H.T. BALOGUN' on document 'A' and signature in the column of 'H.T. BALOGUN' on document 'B'.

7. Your documents are hereby returned. Acknowledge receipt, please.


ASP. R.A. ONWUZULIGBO,
FORENSIC DOCUMENT EXAMINER.

- 2 -

VARIES OF
SPARITY

FEATURES OF DISPARITY
DISPARITY

Ref. No. BFX/9/2015

EMERGENCY CERTIFICATE

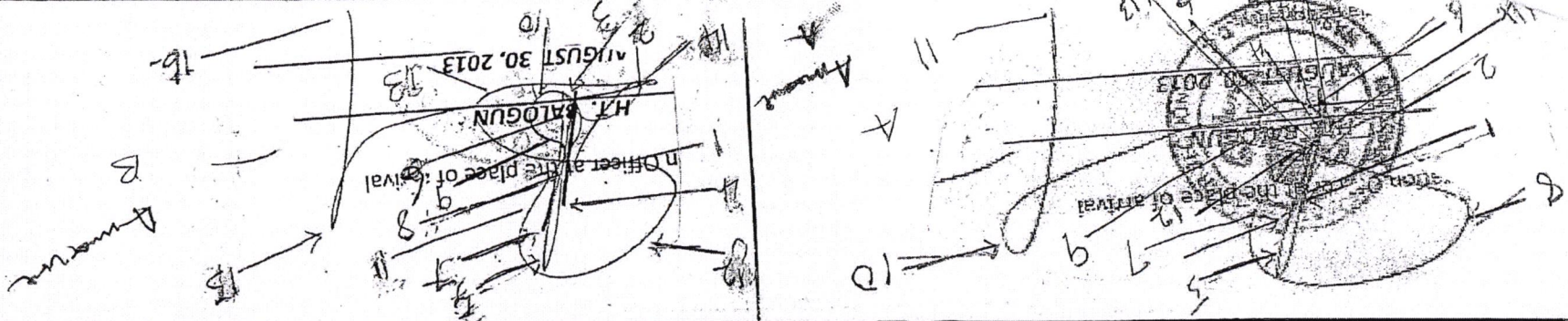
THIS IS TO CERTIFY THAT :-
1. MR. JASON AKANDE
has stated to me that he/she is a CITIZEN OF NIGERIA

EMERGENCY CERTIFICATE

THIS IS TO CERTIFY THAT :-
1. MR. MORKA GANDHI
has stated to me that he/she is a CITIZEN OF NIGERIA

FOR A DIRECT JOURNEY TO LAGOS, NIGERIA BY DEPORTATION CHARTERED FLIGHT AIRLINES DEPORTED
BY U.S. IMMIGRATION FOR THE OFFENSE OF FRAUD XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
With any monthly without responsibility in force by the country of destination or from the responsibility of obtaining a visa when required

DIRECT JOURNEY TO LAGOS, NIGERIA BY DEPORTATION CHARTERED FLIGHT AIRLINES DEPORTED
IMMIGRATION FOR THE OFFENSE OF MAIL/WIRE FRAUD XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX



ASP R.A. DNMUZULIGBO FORENSIC DOCUMENT EXAMINE

— 4 —

EXHIBIT

“C1”.

The Certified Mail Letter And The Postage, Plaintiff
Posted To Defendant Thomas Feeley, To Ask For
Administrative Remedies (Reversal Of The Illegal
Removal).

Jason Shola Akande,

Email Address: sholadotshola@gmail.com.

International Cell Phone Number: +234.8149.155.455

August 1, 2017.

Thomas Feely,

Field Office Director For Detention And Removal,

Buffalo Field Office,

Bureau Of Immigration And Customs Enforcement,

250 Delaware Avenue,

Buffalo, New York. 14202.

United States Of America.

RE: **YOUR PREDECESSOR MICHAEL PHILIPS, FORGED NIGERIAN TRAVEL DOCUMENT, AND HE USED THE FORGERY, TO ILLEGALLY REMOVED ME TO A COUNTRY, I'M NOT A CITIZEN OF, DURING THE PENDENCY OF MY IMMIGRATION COURT CASE, IN ORDER, TO HELP SOME 'ROGUE' CONNECTICUT LAW ENFORCEMENT OFFICERS, GET AWAY WITH MY MULTIPLE ILLEGAL ARREST AND FALSE IMPRISONMENT CIVIL LAW SUITS, I FILED AGAINST THEM.**

Dear Mr Thomas Feely,

This Is The Second Letter I Wrote To You, Regarding The Same Issues However, This Time, I Hope That, You Will Respond to This Letter. Please, Send Your Response Letter, to My Email Address Noted Above.

On September 17, 2013; Your Predecessor: Michael Philips, '**FORGED**' Nigerian Travel Certificate, And He Used The Forged Travel Certificate, To **Forcefully** And **Illegally** Removed Me To A Country, I'm not A Citizen Of (Nigeria), During The

Pendency Of My Immigration Court Case, In Order, To Help Some **'ROGUE'** Connecticut Law Enforcement Officers, Get Away With My:

1. Multiple Illegal Arrest,
2. About 7 Years False Federal Imprisonment,
3. And 2 Years Federal Prison Overtime,

Civil Law Suits Cases, Hanging Over The Heads Of The 'Rogue' Connecticut Law Enforcement Officers.

The Forensic Experts Of Interpol Nigeria Branch/Nigeria Police Have **'Forensically Examined'** The Forged Travel Certificate, Your Predecessor Michael Philips Himself, Gave Nigerian Immigration Officers, As My Authentic Nigerian Travel Document, Issued By Nigerian Embassy, Washington, D.C., When The Removal Plane Arrived In Nigeria. They (Forensic Experts) Forensically Compared The Forged Travel Certificate To An Authentic Travel Certificate, Issued by Nigerian Government, And They (Forensic Experts) Have Certified The Travel Certificate, To Be **"FORGED"**. The Forensic and Document Experts Found, Among Other Illegal Things, Numerous **"CUT And PASTE"**, and Numerous **"Alterations"** On The **"FORGED"** Nigerian Travel Certificate.

Nigerian Government Has Subsequently Declared The Removal As 'ILLEGAL REMOVAL' And 'ILLEGAL ENTRY INTO NIGERIA'.

SEE: A Copy Of The Forged Travel Certificate And The Forensic Police Reports, Attached to This Letter.

I Am Therefore, Respectfully Asking You To Immediately **'REVERSE'** The Illegal Removal, By Bringing Me Back To United States From Nigeria. You Are The Current Field Office Director Therefore, You Have Legal Authority And Legal Obligation To Right The Wrongs Your Predecessor (Michael Philips) Did Thus, You Have Legal Authority To Immediately 'REVERSE', The Illegal Removal However, If You Refuse To Do So Then, You Will Become A Party, In The Subsequent Civil Law Suit.

As You (Supposedly) Know, Federal Court Judges Ordered That, All Victims Of Government Agents Misconduct (Like Me In This Case), Must First Ask For Administrative Remedies From Government, Before Filing Civil Law Suits Against Them, So That, Judges Won't Have To Waste Their Precious Time And Scarce Court Resources, On 'Obvious' Government Misconduct Cases, In Which, Government Should Provide the Requested Remedies Themselves.

This Letter Therefore, Is An 'Official Letter' To You From Me (A Victim Of 'Certified' And 'Proven' U.S. Government Agent Misconduct), 'Officially' Asking You, To Immediately 'REVERSE', A 'Certified' And 'Proven' Illegal Removal, Done By Your Predecessor (Michael Philips) However If, You Failed To Do So, By 2 Weeks From Today's Date Then, I Will Have No Other Choice Than, To File A Civil Law Suit Against You.

NOTE: Any Illegal Removal 'MUST' Be Reversed Because, That Is The Law. You Now Have The Physical, Certified, And Proven Evidence Of Illegal Removal Done By Your Predecessor (Philips), Attached To This Letter, I Hope That, You Will Immediately Reverse The Illegal Removal, So As To Prevent Federal Court Judges From Spending Their Precious Time On It, And So As To Save Federal Court's Scarce Resources.

I'm Not A Nigerian Citizen Because, I Had Renounced My Nigerian Citizenship, Many Decades Prior To The Illegal Removal. This Was The Reason Why, Nigerian Government Denied I.C.E. Application For My Travel Document.

I Will Save A Copy Of This Letter And A Copy Of the Receipt, Of The Certified Mail, I Will Use, To Post This Letter To You, As An 'Exhibit', In The Forth Coming Civil Law Suit, (To Prove To The Federal Court Judges That, In Compliance With The Judges Order Regarding Government Agents Misconduct Civil Law Suits) I Have Already Asked You For The Administrative Remedies (Reversal Of The Certified And Proven Illegal Removal) However, You Deliberately Refused to Reverse it.

I Am Now living In Limbo (And Illegally) In Nigeria While My Wife And Children Living In United States Are Desperately Working On All Possible Means, To 'REVERSE' The Illegal Removal, So As To Re-Unite The Family.

NOTE: *If You Reverse The Illegal Removal, When I Get Back To United States, I Will 'NOT' Ask (Or Sue) You For Money, To Compensate Me For the Illegal Removal Because, I Just Want to 'Re-Unite' With My Wife And Children living in United States.*

Sincerely Yours,

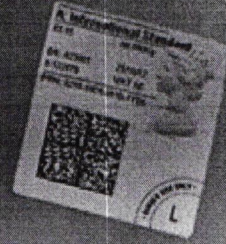
Jason Shola Akande.

- CC: 1.) Thomas Homan, The Acting ICE Director, U.S. Immigration And Customs Enforcement, 500 12TH St, S.W. Washington, D.C. 20024.
- 2.) Kirstjen Nielsen, Secretary Of Homeland Secretary, 3801 Nebraska Ave, N.W., Washington, D.C. 20016.

EXHIBIT A.

THE FORENSIC EVALUATION REPORTS OF
THE FORGED NIGERIAN TRAVEL
CERTIFICATE, BY THE FORENSIC EXPERTS OF
INTERPOL/NIGERIAN POLICE, AND THE
FORGED TRAVEL CERTIFICATE, ATTACHED.

Thomas Feely,
Field Office Director for Detention and Removal
Buffalo Field Office,
Bureau of Immigration and Customs Enforcement
250 Delaware Avenue
Buffalo, New York 14202
United State of America



EXHIBIT

“C2”.

The Certified Mail Letter And The Postage, Plaintiff
Posted To Defendant Thomas Homan, To Ask For
Administrative Remedies (Reversal Of The Illegal
Removal).

Jason Shola Akande,

Email Address: sholadotshola@gmail.com.

International Cell Phone Number: +234.8149.155.455

August 1, 2017.

Thomas Homan, The Acting I.C.E. Director,
United States Immigration And Customs Enforcement,
500 12TH Street, SW,
Washington, D.C. 20024.
United States Of America.

RE: ICE FIELD OFFICE DIRECTOR: MICHAEL PHILIPS, FORGED NIGERIAN TRAVEL DOCUMENT, AND HE USED THE FORGERY, TO ILLEGALLY REMOVED ME TO A COUNTRY, I'M NOT A CITIZEN OF, DURING THE PENDENCY OF MY IMMIGRATION COURT CASE, IN ORDER, TO HELP SOME 'ROGUE' CONNECTICUT LAW ENFORCEMENT OFFICERS, GET AWAY WITH MY MULTIPLE ILLEGAL ARREST AND FALSE IMPRISONMENT CIVIL LAW SUITS, I FILED AGAINST THEM.

Dear Mr Thomas Homan,

This Is The Second Letter, I Wrote To You, Regarding The Same Issues However, This Time, I Hope That, You Will Respond to This Letter. Please, Send Your Response Letter, to My Email Address Noted Above.

On September 17, 2013; Ice Field Office Director, For Buffalo, New York, Field Office: Michael Philips, 'FORGED' Nigerian Travel Certificate, And He Used The Forged Travel Certificate, To Forcefully And Illegally Removed Me To A Country, I'm not A Citizen Of (Nigeria), During The Pendency Of My Immigration Court Case, In Order, To Help Some 'ROGUE' Connecticut Law Enforcement Officers, Get Away With My:

1. Multiple Illegal Arrest,
2. About 7 Years False Federal Imprisonment,
3. And 2 Years Federal Prison Overtime,

Civil Law Suits Cases, Hanging Over The Heads Of The 'Rogue' Connecticut Law Enforcement Officers.

The Forensic Experts Of Interpol Nigeria Branch/Nigeria Police Have 'Forensically Examined' The Forged Travel Certificate, Your Predecessor Michael Philips Himself, Gave Nigerian Immigration Officers, As My Authentic Nigerian Travel Document, Issued By Nigerian Embassy, Washington, D.C., When The Removal Plane Arrived In Nigeria. They (Forensic Experts) Forensically Compared The Forged Travel Certificate To An Authentic Travel Certificate, Issued by Nigerian Government, And They (Forensic Experts) Have Certified The Travel Certificate, To Be **"FORGED"**. The Forensic and Document Experts Found, Among Other Illegal Things, Numerous **"CUT And PASTE"**, and Numerous **"Alterations"** On The **"FORGED"** Nigerian Travel Certificate.

Nigerian Government Has Subsequently Declared The Removal As 'ILLEGAL REMOVAL' And 'ILLEGAL ENTRY INTO NIGERIA'.

SEE: A Copy Of The Forged Travel Certificate And The Forensic Police Reports, Attached to This Letter.

I Am Therefore, Respectfully Asking You To Immediately **'REVERSE'** The Illegal Removal, By Bringing Me Back To United States From Nigeria. You Are The Current Field Office Director Therefore, You Have Legal Authority And Legal Obligation To Right The Wrongs Buffalo Field Office Director (Michael Philips) Did Thus, You Have Legal Authority To Immediately 'REVERSE', The Illegal Removal However, If You Refuse To Do So Then, You Will Become A Party, In The Subsequent Civil Law Suit.

As You (Supposedly) Know, Federal Court Judges Ordered That, All Victims Of Government Agents Misconduct (Like Me In This Case), Must First Ask For Administrative Remedies From Government, Before Filing Civil Law Suits Against

Them, So That, Judges Won't Have To Waste Their Precious Time And Scarce Court Resources, On 'Obvious' Government Misconduct Cases, In Which, Government Should Provide the Requested Remedies Themselves.

This Letter Therefore, Is An 'Official Letter' To You From Me (A Victim Of 'Certified' And 'Proven' U.S. Government Agent Misconduct), 'Officially' Asking You, To Immediately 'REVERSE', A 'Certified' And 'Proven' Illegal Removal, Done By Buffalo Field Office Director (Michael Philips) However If, You Failed To Do So, By 2 Weeks From Today's Date Then, I Will Have No Other Choice Than, To File A Civil Law Suit Against You.

NOTE: Any Illegal Removal 'MUST' Be Reversed Because, That Is The Law. You Now Have The Physical, Certified, And Proven Evidence Of Illegal Removal Done By Buffalo Field Office Director (Philips), Attached To This Letter, I Hope That, You Will Immediately Reverse The Illegal Removal, So As To Prevent Federal Court Judges From Spending Their Precious Time On It, And So As To Save Federal Court's Scarce Resources.

I'm Not A Nigerian Citizen Because, I Had Renounced My Nigerian Citizenship, Many Decades Prior To The Illegal Removal. This Was The Reason Why, Nigerian Government Denied I.C.E. Application For My Travel Document.

I Will Save A Copy Of This Letter And A Copy Of the Receipt, Of The Certified Mail, I Will Use, To Post This Letter To You, As An 'Exhibit', In The Forth Coming Civil Law Suit, (To Prove To The Federal Court Judges That, In Compliance With The Judges Order Regarding Government Agents Misconduct Civil Law Suits) I Have Already Asked You For The Administrative Remedies (Reversal Of The Certified And Proven Illegal Removal) However, You Deliberately Refused to Reverse it.

I Am Now living In Limbo (And Illegally) In Nigeria While My Wife And Children Living In United States Are Desperately Working On All Possible Means, To 'REVERSE' The Illegal Removal, So As To Re-Unite The Family.

NOTE: *If You Reverse The Illegal Removal, When I Get Back To United States, I Will 'NOT' Ask (Or Sue) You For Money, To Compensate Me For the Illegal Removal*

Because, I Just Want to 'Re-United' With my Wife And Children living in United States.

Sincerely Yours,

Jason Shola Akande.

CC: 1.) Kirstjen Nielsen, Secretary, Department Of Homeland Security,
3801 Nebraska Ave, N.W., Washington, D.C. 20016.
2.) Thomas Feeley, ICE Field Office Director, 250 Delaware Ave,
Buffalo, New York. 14202.

Thomas Homan The Acting ICE Director
United States Immigration and Customs Enforcement
500 12th Street, SW
United State of America

EXHIBIT

“C3”.

The Certified Mail Letter And The Postage, Plaintiff
Posted To Defendant Kirstjen Nielsen, To Ask For
Administrative Remedies (Reversal Of The Illegal
Removal).

Jason Shola Akande,

Email Address: sholadotshola@gmail.com.

International Cell Phone Number: +234.8149.155.455

August 1, 2017.

The Secretary Of U.S. Department Of Homeland Security (Kirstjen Nielsen),

United States Department Of Homeland Security,

3801 Nebraska Ave, NW,

Washington, D.C. 20024.

United States Of America.

RE: ICE FIELD OFFICE DIRECTOR: MICHAEL PHILIPS, FORGED NIGERIAN TRAVEL DOCUMENT, AND HE USED THE FORGERY, TO ILLEGALLY REMOVED ME TO A COUNTRY, I'M NOT A CITIZEN OF, DURING THE PENDENCY OF MY IMMIGRATION COURT CASE, IN ORDER, TO HELP SOME 'ROGUE' CONNECTICUT LAW ENFORCEMENT OFFICERS, GET AWAY WITH MY MULTIPLE ILLEGAL ARREST AND FALSE IMPRISONMENT CIVIL LAW SUITS, I FILED AGAINST THEM.

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2. About 7 Years False Federal Imprisonment,
3. And 2 Years Federal Prison Overtime,

Civil Law Suits Cases, Hanging Over The Heads Of The 'Rogue' Connecticut Law Enforcement Officers.

The Forensic Experts Of Interpol Nigeria Branch/Nigeria Police Have 'Forensically Examined' The Forged Travel Certificate, Your Predecessor Michael Philips Himself, Gave Nigerian Immigration Officers, As My Authentic Nigerian Travel Document, Issued By Nigerian Embassy, Washington, D.C., When The Removal Plane Arrived In Nigeria. They (Forensic Experts) Forensically Compared The Forged Travel Certificate To An Authentic Travel Certificate, Issued by Nigerian Government, And They (Forensic Experts) Have Certified The Travel Certificate, To Be **"FORGED"**. The Forensic and Document Experts Found, Among Other Illegal Things, Numerous **"CUT And PASTE"**, and Numerous **"Alterations"** On The **"FORGED"** Nigerian Travel Certificate.

Nigerian Government Has Subsequently Declared The Removal As 'ILLEGAL REMOVAL' And 'ILLEGAL ENTRY INTO NIGERIA'.

SEE: A Copy Of The Forged Travel Certificate And The Forensic Police Reports, Attached to This Letter.

I Am Therefore, Respectfully Asking You To Immediately **'REVERSE'** The Illegal Removal, By Bringing Me Back To United States From Nigeria. You Are The Current Field Office Director Therefore, You Have Legal Authority And Legal Obligation To Right The Wrongs Buffalo Field Office Director (Michael Philips) Did Thus, You Have Legal Authority To Immediately 'REVERSE', The Illegal Removal However, If You Refuse To Do So Then, You Will Become A Party, In The Subsequent Civil Law Suit.

As You (Supposedly) Know, Federal Court Judges Ordered That, All Victims Of Government Agents Misconduct (Like Me In This Case), Must First Ask For Administrative Remedies From Government, Before Filing Civil Law Suits Against

Them, So That, Judges Won't Have To Waste Their Precious Time And Scarce Court Resources, On 'Obvious' Government Misconduct Cases, In Which, Government Should Provide the Requested Remedies Themselves.

This Letter Therefore, Is An 'Official Letter' To You From Me (A Victim Of 'Certified' And 'Proven' U.S. Government Agent Misconduct), 'Officially' Asking You, To Immediately 'REVERSE', A 'Certified' And 'Proven' Illegal Removal, Done By Buffalo Field Office Director (Michael Philips) However If, You Failed To Do So, By 2 Weeks From Today's Date Then, I Will Have No Other Choice Than, To File A Civil Law Suit Against You.

NOTE: Any Illegal Removal 'MUST' Be Reversed Because, That Is The Law. You Now Have The Physical, Certified, And Proven Evidence Of Illegal Removal Done By Buffalo Field Office Director (Philips), Attached To This Letter, I Hope That, You Will Immediately Reverse The Illegal Removal, So As To Prevent Federal Court Judges From Spending Their Precious Time On It, And So As To Save Federal Court's Scarce Resources.

I'm Not A Nigerian Citizen Because, I Had Renounced My Nigerian Citizenship, Many Decades Prior To The Illegal Removal. This Was The Reason Why, Nigerian Government Denied I.C.E. Application For My Travel Document.

I Will Save A Copy Of This Letter And A Copy Of the Receipt, Of The Certified Mail, I Will Use, To Post This Letter To You, As An 'Exhibit', In The Forth Coming Civil Law Suit, (To Prove To The Federal Court Judges That, In Compliance With The Judges Order Regarding Government Agents Misconduct Civil Law Suits) I Have Already Asked You For The Administrative Remedies (Reversal Of The Certified And Proven Illegal Removal) However, You Deliberately Refused to Reverse it.

I Am Now living In Limbo (And Illegally) In Nigeria While My Wife And Children Living In United States Are Desperately Working On All Possible Means, To 'REVERSE' The Illegal Removal, So As To Re-Unite The Family.

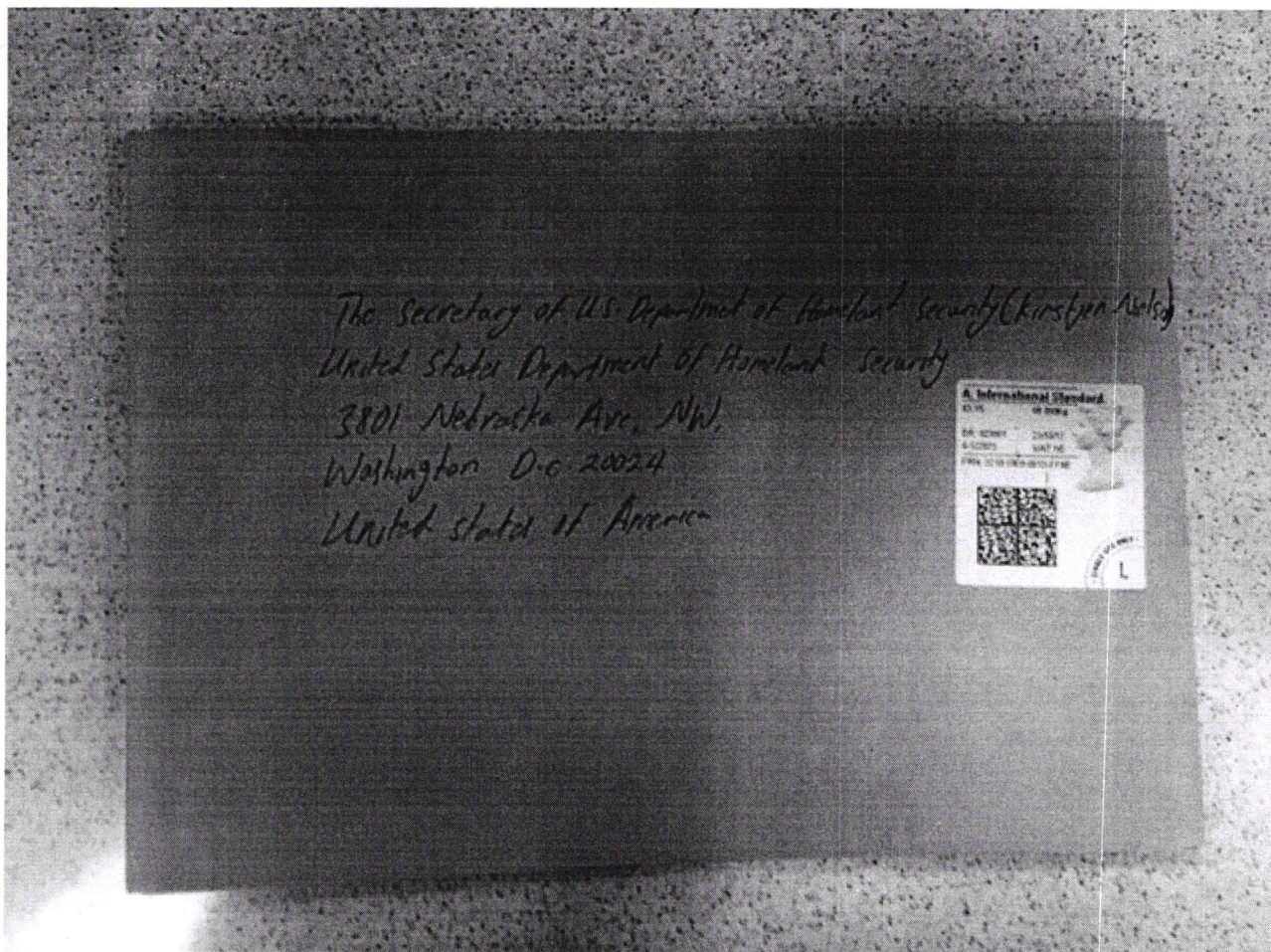
NOTE: *If You Reverse The Illegal Removal, When I Get Back To United States, I Will 'NOT' Ask (Or Sue) You For Money, To Compensate Me For the Illegal Removal*

Because, I Just Want to 'Re-Unite' With my Wife And Children living in United States.

Sincerely Yours,

Jason Shola Akande.

- CC:
- 1.) Thomas Homan, The Acting ICE Director, U.S. Immigration And Customs Enforcement, 500 12TH St, S.W. Washington, D.C. 20024.
 - 2.) Thomas Feeley, ICE Field Office Director, 250 Delaware Ave, Buffalo, New York. 14202.



**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK (BUFFALO)**

JASON SHOLA AKANDE) CASE NO.:

(Petitioner))

VS.)

MICHAEL PHILIPS, Et. Al.,)

(Defendants)) AUGUST 16, 2017.

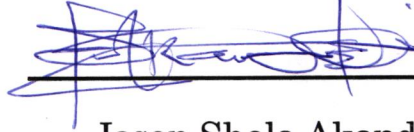
**MOTION FOR PERMISSION TO USE COURT'S ELECTRONIC
FILINGS SYSTEMS, IN THE NEW PETITION, ACCOMPANYING THIS
MOTION**

Pursuant to Federal Rules Of Civil Procedure (F.R.C.P.); The Pro Se Petitioner Jason Shola Akande, hereby moves the Court, For Permission To Use The Court's Electronic Filing Systems, For Electronic Filings Of His New Petition, Which Accompany This Motion.

The Petitioner Is Currently Registered User Of The Up-Graded PACER. Additionally, The Petitioner Is Currently Registered User Of 2nd Circuit Court Electronic Filing Systems (CM/ECF), In Petitioner's Appeal Case Number: '13-4629'. Similarly, Petitioner Is Currently Registered User Of Connecticut District Court Electronic Filings Systems (CM/ECF), In His Connecticut Trial Court Case Number: '3:11-cv-1125-rnc'.

WHEREFORE, The Petitioner request that, his Motion be **Granted**.

RESPECTFULLY SUBMITTED,



Jason Shola Akande,

Pro Se Petitioner.

CERTIFICATE OF SERVICE.

This is to certify that, a copy of the foregoing: "Motion For Permission To Use Court's Electronic Filing Systems.....", was sent today, August 16, 2017: By Electronic Filing (CM/ECF); And By Posting, To:

- 1.) Michael Philips,
250 Delaware Avenue,
Buffalo, New York.
- 2.) Including All Parties On Record.

BY:



Jason Shola Akande,

Pro Se Petitioner.

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

JASON SHOLA AKANDE

(b) County of Residence of First Listed Plaintiff **HARTFORD**

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

PRO SE: JASON SHOLA AKANDE,
31 SUTTON PLACE, BLOOMFIELD, C.T. 06002

DEFENDANTS

MICHAEL PHILIPS; THOMAS FEELEY; THOMAS HOMAN;
KIRSTJEN NIELSEN; AND JOHN DOE 1.

County of Residence of First Listed Defendant **BUFFALO, NEW YORK**

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Injury Product Liability <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

1983 BIVENS ACTION

Brief description of cause:

4TH, 5TH, 8TH AND 14TH CONSTITUTIONAL AMENDMENTS RIGHTS VIOLATIONS**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$**10,000,000.00**

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

08/16/2017

PRO SE

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE